

Welburn Hall School



Closed Circuit Television (CCTV) Policy

Policy Created: April 2018

Review Period: Bi Annually

Next review Due:

Approved by Governors: .....

Date:

# Welburn Hall School

## Introduction

The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) systems at Welburn Hall School. The two systems comprise a number of fixed and dome cameras located around the school site (see Appendix 1 for a list of camera locations).

Cameras are monitored from three locations

1. School Reception (Live Monitoring Only)
2. Night Staff Care Station (External Cameras No Sound Recording)
3. Site Managers Office (Internal and External Additional Cameras)

The viewing of any CCTV footage is authorised by the Headteacher, and will be limited to the Senior Leadership Team (SLT).

This Policy adheres to Data Protection Act 1998 guidelines, and GDPR 25<sup>th</sup> May 2018.

## Safeguarding

The Governors, Headteacher and Senior Leadership team take their responsibilities around safeguarding very seriously and have to be assured that pupils and staff are safe at all times especially during the night. The role of the CCTV is to act as a deterrent to potential intruders. The site is open and easily accessible and as such the CCTV adds an additional layer of protection from a safeguarding point of view both during the day and overnight.

During the day given that all our classrooms open directly onto the playground CCTV provides us with additional coverage to inform any response to intruders' intent on holding a group to hostage.

During the evening and overnight, the CCTV will alert waking staff to any intruders' and assist with the movement of boarders providing an additional safeguarding against peer on peer abuse, and especially the missing children protocol in responding to any attempts to leave site.

In addition to all the above, the CCTV will support the National Minimum Standards (NMS) to which the residential provision adhere, and these are rigorously checked during the annual Ofsted inspection.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/416188/20150319\\_nms\\_rss\\_standards.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/416188/20150319_nms_rss_standards.pdf)

The relevant standards are:

***5.7 Residential accommodation is reserved for the use of those children designated to use it, and is protected from access by unauthorised persons. Any use of school facilities by individuals or groups does not allow members of the public (including members of 11 organised groups using school facilities) substantial and unsupervised access to children, or to residential accommodation while occupied by children.***

***5.8 Any use of surveillance equipment (e.g. CCTV cameras) or patrolling of school buildings or grounds for security purposes does not intrude unreasonably on children's privacy.***

***6.3 The school ensures that the welfare of pupils at the school is safeguarded and promoted by the drawing up and effective implementation of a written risk assessment policy and appropriate action is taken to reduce risks that are identified.***

## Objectives of the CCTV system

- To protect pupils and staff at the school.
- Increase personal safety and reduce the fear of crime
- To protect the school buildings and their assets
- To support the Police in a bid to deter and detect crime
- To assist in identifying, apprehending and prosecuting offenders
- To protect members of the public and private property

## Statement of intent

- The CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 1998 and complies with the requirements both of the Data Protection Act and the Commissioner's Code of Practice.
- The school will treat the system and all information, documents and recordings obtained and used, as data which is protected by the Act.
- Cameras will be used to monitor activities within the Hall and School, its car parks and outdoor areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of the school staff, pupils and visitors.
- Cameras have been sited so they only capture images for the purposes for which they are installed, and care will be taken to ensure that reasonable privacy expectations are not violated. The school will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act
- Cameras are positioned so they do not capture images of areas that are not of interest and are not intended to be the subject of surveillance such as individuals' private property including gardens and other areas of private property.
- Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Recordings will only be released to the police for use in the investigation of a specific crime. Recordings will never be released to the media for purposes of entertainment.
- The planning and design has ensured that the Scheme gives maximum effectiveness and efficiency but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.
- Warning signs, as required by the Code of Practice of the Information Commissioner have been placed at all access routes to areas covered by the school CCTV, and within the area covered (see Appendix 2)

## Operation of the system

- The Scheme will be administered and managed by the Head Teacher or the Data Controller as defined by the Data Protection Act, in accordance with the principles and objectives expressed in the code.
- The CCTV system will be operated 24 hours each day, every day of the year.

## Control Room

- The Site Manager will check and confirm the efficiency of the system daily and in particular that the equipment is properly recording and that cameras are functional.
- Access to the CCTV Control Room during viewing will be strictly limited to the Authorised Persons only.

- Authorised Personnel must satisfy themselves over the identity of any other visitors to the Control Room and the purpose of the visit. Where any doubt exists access will be refused. Details of all visits and visitors will be endorsed in the Control Room log book (see Appendix 3)
- If out of hours emergency maintenance arises, the Site Manager must be satisfied of the identity and purpose of contractors before allowing entry.
- All visitors/Contractors will book in through the Inventory system at school reception. Full details of visitors including time/data of entry and exit will be recorded.
- Emergency procedures will be used in appropriate cases to call the Emergency Services.

### **Monitoring procedures**

- Camera surveillance recording may be maintained at all times.
- A Camera is installed in both of the CCTV Control Rooms to which pictures will be continuously recorded.
- Covert surveillance will only be undertaken in the most extreme circumstances and must be authorised by the Head Teacher. It must be necessary and proportionate and cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private such as toilet cubicles. Authorisation Forms must be completed and retained. Covert monitoring will cease at the end of each relevant operation.

### **Image storage procedures**

In order to maintain and preserve the integrity of the disks used to record events from the hard drive and the facility to use them in any future proceedings, the following procedures for their use and retention must be strictly adhered to:

- ❖ Each disk must be identified by a unique mark.
- ❖ Before using each disk must be cleaned of any previous recording.
- ❖ The Authorised Person shall register the date and time of disk insert, including tape reference.
- ❖ Footage required for evidential purposes must be sealed, witnessed, signed by the Data Controller, dated and stored in the school safe. If a disk is not copied for the police before it is sealed, a copy may be made at a later date providing that it is then resealed, witnessed, signed by the Data Controller, dated and returned to the school safe.
- ❖ If the footage is archived the reference must be noted.
- ❖ Footage may be viewed by, and a copy provided to, the Police for the prevention and detection of crime. The Head Teacher will determine whether to make disclosure to the police based upon Section 29(3) of the Data Protection Act 1998. A register will be maintained of the release of footage to the Police or other authorised applicants.
- ❖ Viewing of footage by the Police must be recorded in writing on the Authorisation to Access CCTV Images form (Appendix 4) and in the log book (Appendix 3)
- ❖ Should footage be required as evidence, a copy may be released to the Police under the procedures described in (Image Storage Procedures iv) of this Code. The Police become the Data Controller of the footage once it is provided to them. On occasions when a Court requires the release of original footage this will be produced from the school safe, complete in its sealed bag.
- ❖ The Police may require the school to retain the stored footage for possible use as evidence in the future. Such footage will be properly indexed and securely stored until they are needed by the Police.
- ❖ Disclosure will only take place where there is a legal requirement placed upon the school to do so and, there is legal power upon the school to do so, e.g. in response to a Court Order; in response to a subject access where an individual requests access to footage of themselves; under Section 5 of the DPA where disclosure is necessary for legal proceedings etc. A fee can be charged in such circumstances: £10 for subject access requests; a sum not exceeding the cost of materials in other cases.

### **Breaches of the policy (including breaches of security)**

- Any breach of the Code of Practice by school staff will be initially investigated by the Headteacher, in order for her to take the appropriate disciplinary action.
- Any serious breach of the Code of Practice will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach.

**Assessment of the scheme and code of practice**

- Performance monitoring, including random operating checks, may be carried out by the Data Controller

**Complaints**

- Any complaints about the school’s CCTV system should be addressed to the Head Teacher.

**Access by the Data Subject**

- The Data Protection Act provides Data Subjects (individuals to whom "personal data" relate) with a right to data held about themselves, including those obtained by CCTV.
- Requests for Data Subject Access should be made to the Head Teacher.

**Public information**

- Copies of this Code of Practice will be available to the public from the School Office and the Head Teacher.

**Summary of Key Points**

This Code of Practice will be reviewed every two years.

- The CCTV system is owned and operated by the school.
- The Night Station will be staffed out of school hours and real time monitoring will take place of external areas.
- The Site Manager’s office is not open to visitors except by prior arrangement and it is secured at all unoccupied times and is CCTV Monitored.
- Recorded footage will be properly indexed, stored and destroyed after appropriate use
- Recorded Footage may only be viewed by Authorised Personnel.
- Live Streaming may be viewed by School Receptionist, Night Time Care Staff and Site Manager for security purposes.
- Footage required as evidence will be properly recorded, witnessed and packaged before copies are released to the police.
- Footage will not be made available to the media for commercial or entertainment reasons.
- Any breaches of this code will be investigated by the Head Teacher.
- An independent investigation will be carried out in event of any breach.

**Appendix 1**

**List of Camera Locations**

Outdoor	House	School
Students Bungalow Entrance	Hall Reception	KS2 Classroom
Hall to fork on North Drive	Games Room Corridor	LKS3 Classroom

Taxi Pickup/Drop off Area	West Corridor	UKS3 Classroom
School east corner to Fork	Rear Stair Lobby	LKS4 Classroom
Hall front west to east	Games Room	KS4 Classroom
Hall west door entrance	General Office	Forest Classroom
Hall Rear west to east	Front Stairs landing 1 <sup>st</sup> Floor	College 1 Classroom
Hall Rear East side	Rear Stairs landing 1 <sup>st</sup> Floor	College 2 Classroom
School Pointing to West Gate	Night Station 1 <sup>st</sup> Floor	College 3 Classroom
School Main Gate	Small Dining Room	Food Tech Room
	Large Dining Room	Therapy Room
	Internet Café	School Hall Foyer
	Site Managers Office	Library

## Appendix 2 - CCTV Signage

It is a requirement of the Data Protection Act 1998 to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The school is to ensure that this requirement is fulfilled.

The CCTV sign should include the following:

- That the area is covered by CCTV surveillance and pictures are recorded
- The purpose of using CCTV
- The name of the school
- The contact telephone number or address for enquiries







## Appendix 4 - Authorisation to Access CCTV Images

<b>Date and time of Requested access:</b>
<b>Date and time of incident:</b>
<b>Nature of Incident:</b>
<b>Access request approved by:</b>
<b>Camera locations to be checked:</b>
<b>Details of Images observed:</b>
<b>Permission to a Recording being made:</b> Disk: Tape: Other Media: (include reference or id number)  Provided to:  Reason:  Approved by (Head Teacher):
<b>Surveillance Request</b>  Reason for the surveillance:  Nature and Duration of surveillance:  Approved by (Head Teacher):  Outcome: